

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 2019-281-S**

IN RE:

APPLICATION OF PALMETTO UTILITIES,  
 INC. FOR AN INCREASE OF RATES AND  
 CHARGES FOR THE PROVISION OF  
 SEWER SERVICE AND MODIFICATIONS  
 TO CERTAIN TERMS AND CONDITIONS  
 OF THE PROVISION OF SEWER SERVICE

**SOUTH CAROLINA DEPARTMENT  
 OF CONSUMER AFFAIRS' FIRST SET  
 OF INTERROGATORIES TO  
 PALMETTO UTILITIES, INC.**

Pursuant to S.C. Code Ann. Regs. 103-833(C), the South Carolina Department of Consumer Affairs (the "Department"), by and through its undersigned counsel, hereby submits this First Set of Interrogatories to Palmetto Utilities, Inc. (the "Company"). Pursuant to South Carolina Rule of Civil Procedure 26(e), each interrogatory is continuing until the time of the hearing such that the Company must promptly transmit to the Department the requested information as it becomes available. Please forward to the undersigned, via email, your first iteration of responses to the following request on or before Monday, March 23, 2020:

- 1-1 Please provide the names and addresses of any witnesses whom the Company intends to use at the hearing in this case and identify with specificity the issues to be addressed by such witnesses.
- 1-2 Referencing the Company's amended application, pages 4 and 5:
- a. Please identify and explain in detail the expenses associated with the operation of the Company's system that have increased by approximately \$2,512,000;
  - b. Please identify and explain in detail the investments in capital improvements totaling approximately \$11.409 million that have been made (or will be made prior to the hearing in this matter), including geographical location(s) of such improvements.

- 1-3 Please explain the reasoning for utilization of a flat fee instead of volumetric billing for customers.
- 1-4 Please identify and explain what the Company proposes as a proper return on equity.
- 1-5 Please identify and explain the total rate base proposed by the Company.
- 1-6 Please identify and explain in detail what evidence the Company will use to support its position regarding return on equity and rate base.

South Carolina Department of Consumer Affairs

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March 3, 2020  
Columbia, South Carolina